



SDMS DocID

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PHILIP MORRIS

U.S.A.

P. O. BOX 26603, RICHMOND, VIRGINIA 23261 TELEPHONE (804) 274-2000

January 9, 2006

Mr. Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: Response of Philip Morris USA Inc. to Request for Information Pursuant to
Section 104(e) of CERCLA With Regard to Safety Light Corporation Site,
Bloomsburg, Pennsylvania**

Dear Mr. Steinmetz:

This is the response, as of the date set forth above, of Philip Morris USA Inc. ("Philip Morris") to the undated letter, received by us on November 9, 2005, requesting information with regard to the Safety Light Corporation Site in Bloomsburg, Pennsylvania (hereinafter the "Information Request").¹ We understand that Philip Morris has a continuing obligation to supplement this response if additional information becomes available, and we reserve the right to submit additional information that we may find that is responsive to the Information Request.

Set forth below are each Question contained in the Information Request in ***bold-faced, italicized type***, followed by Philip Morris' response as of the date of this letter.

1. ***Describe in detail the business relationship between Philip Morris and Safety Light.***

¹ The Information Request called for a response within 30 calendar days of the date on which we received it. In an e-mail to you dated December 9, 2005, on behalf of Philip Morris, Ronald Gahagan confirmed your agreement, on behalf of EPA Region III, to grant Philip Morris an extension until January 9, 2006, to submit its response.

Mr. Harry R. Steinmetz (3HS62)

January 09, 2006

Page 2

RESPONSE: Based on a diligent search of existing records and on interviews with current and former employees most likely to have pertinent information, Philip Morris has found no information concerning a business relationship between it and Safety Light Corporation. Philip Morris has found records indicating that radiation sources containing Po-210 and a "Titanium Tritide Foil" containing Hydrogen 3, each manufactured, sold and/or marketed by U.S. Radium Corporation, were listed on a license issued to Philip Morris by the U.S. Atomic Energy Commission (now referred to as the Nuclear Regulatory Commission ("NRC")). On three occasions during the period from July 1964 to 1973, an NRC license (#45-00385-04) issued to Philip Morris was amended to list a sealed source containing Po-210. With the first two amendments, the source was identified as "U.S. Radium Corp. Model Lab 204-1A." With the third amendment the source was identified as "U.S. Radium Corp. Model 204-1A." In addition, on the third amendment a "Titanium Tritide Foil (U. S. Radium LAB 508-1) contained in Victoreen Instrument Co. detector cell" was added to the license. We have found no other information concerning a business relationship with U.S. Radium or any other identified predecessor of Safety Light Corporation.

2. ***Did Philip Morris ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?***

RESPONSE: Based on a diligent search of existing files and interviews with current and former employees, Philip Morris does not believe that it ever transported and/or brokered hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by any of the entities listed in this question.

3. ***If you answered "yes" to Question 2, please answer the following questions:***
- a. ***Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.***
 - b. ***Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.***
 - c. ***For each customer/generator/transporter for which you transported/ brokered hazardous substances, radioactive waste or other wastes, provide:***
 - i. ***the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);***

- ii. *the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;*
- iii. *the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;*
- iv. *the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;*
- v. *all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;*
- vi. *the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.*

RESPONSE: Based on our response to Question 2, these questions are not applicable.

4. *Did Philip Morris ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?*

RESPONSE: Based on a diligent search of existing files and interviews with current and former employees, Philip Morris does not believe that it ever generated hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by any of the entities listed in this question.

5. *If you answered "yes" to Question 4, please address the following issues:*

- a. *Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:*
 - i. *the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the*

process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;

- ii. *the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;*
 - iii. *the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;*
 - iv. *the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and*
 - v. *the method of treatment and/or disposal of the above.*
- b. *Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:*
- i. *disposed of or treated radioactive or hazardous materials at the Site;*
 - ii. *arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and*
 - iii. *arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.*
- c. *If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:*
- i. *the persons with whom you, or other such persons, made such arrangements;*
 - ii. *every date on which such arrangements took place;*
 - iii. *for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;*

- iv. *the precise locations at which each material was disposed or treated at the Site;*
- v. *the persons who selected the Site as the place at which materials were disposed or treated;*
- vi. *the final disposition of each material involved in such transactions; and*
- vii. *the names of employees, officers, owners, and agents for each transporter.*
- d. *For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:*
 - i. *the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and*
 - ii. *any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.*
- e. *Provide the names, titles, and areas of responsibility of any persons, including all Philip Morris employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.*
- f. *Describe any permits or applications and any correspondence between Philip Morris and any regulatory agencies regarding materials transported to or disposed of at the Site.*
- g. *Provide copies of any correspondence between Philip Morris and any third party regarding materials transported or disposed of at the Site.*
- h. *Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.*
- i. *Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.*

- j. *Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.*
- k. *For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.*

RESPONSE: Based on our response to Question 4, these questions are not applicable.

- 6. *If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.*

RESPONSE: Philip Morris is without knowledge of persons other than those consulted to respond to the Information Request who are able to provide more detailed or complete responses to any questions addressed herein, or may be able to provide additional responsive documents.

- 7. *For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.*

RESPONSE: Philip Morris is without knowledge of any other persons from whom information or documents responsive to EPA's Information Request may be obtained.

- 8. *If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.*

RESPONSE: Philip Morris has no information about other parties who may have information that may assist EPA in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.

Mr. Harry R. Steinmetz (311S62)

January 09, 2006

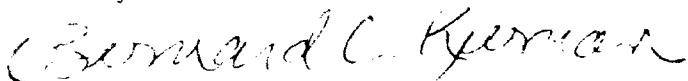
Page 7

9. *If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:*
- a. *Your document retention policy;*
 - b. *A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;*
 - c. *A description of the type of information that would have been contained in the documents; and*
 - d. *The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.*

RESPONSE: Based on the answers provided above and the information available to Philip Morris, these requests are not applicable to our response.

Please contact me if you have questions about this response to the Information Request.

Sincerely,



Bernard C. Kiernan
Manager, Regulations and Permitting
Philip Morris USA Inc.

cc: Ronald C. Gahagan, Esq.